



**Matthew Rodriguez**  
Secretary for  
Environmental Protection

## Department of Toxic Substances Control

Deborah O. Raphael, Director  
5796 Corporate Avenue  
Cypress, California 90630



**Edmund G. Brown Jr.**  
Governor

December 5, 2011

Ms. Becky Ross  
Cabazon Band of Mission Indians  
Indio, CA

Dear Ms. Ross:

Thank you for your transmittal of the Cabazon Band of Mission Indians (CBMI) Groundwater Analysis, which you provided to Hamid Saebfar, Department of Toxic Substances Control (the Department). I am a staff member of the Department's Office of Geology and have been asked by Hamid and Fred Zanoria to evaluate the information in the data package that you provided.

Your transmittal included various items regarding groundwater sampling and analyses conducted in May and June 2011 for the Cabazon Resource Recovery Park (CRRP) and related to the Western Environmental Incorporated (WEI) soil recycling facility. Included with your memorandum is:

- A memorandum from you to Mr. Paul Slama and Mr. Paul MacKey dated October 26, 2011, regarding the "DTSC-WEI Water Analysis Request",
- A list of well identifications and locations,
- A satellite-view aerial photograph showing the locations of groundwater wells CRRP-1, CRRP-2, CRRP-3, CRRP-4,
- Well completion reports for wells CRRP-1 and CRRP-2,
- Two plan drawings that show locations of monitoring wells along the east, south, and west borders of the WEI facility. One drawing is stamped and signed by licensed land surveyor, Leslie A. Brooks. The second plan is labeled as, "Figure 2. Site Plan & Monitoring Well Locations",
- Analytical laboratory data and a chain-of-custody for samples from wells CRRP-1, CRRP-2, and CRRP-3 that were collected on May 26, 2011, and
- Analytical laboratory data and a chain-of-custody for the samples from well CRRP-4 that were collected on June 7, 2011.

Based on my understanding of information in the data package I am requesting some additional information on the wells and groundwater sampling to clarify or complete the information already provided, as follows:

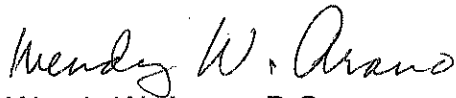
1. With regards to the shallow wells, the Department requests that any previous groundwater sampling and groundwater gradient measurement results be made available for our review. Please also inform the Department when the shallow wells were last sampled and when they last had sufficient water to be sampled.
2. If available, please provide the well construction information including casing diameter, screened intervals, filter pack type and size, and total depths of the shallow wells should be provided to the Department for review.
3. Well Completion Reports for CRRP-1 and CRRP-2 are provided with additional handwritten well identification notes. The handwritten notes and the typed well identification on the reports do not agree (Owners Well No. 2, as listed on the well completion report, is identified as CRRP-1 in handwritten note and vice versa). Please clarify which well identifications are correct.
4. If it is available, the Department would like to have copies of the well construction information for CRRP-3 and CRRP-4.
5. If you can also provide the static depth to water measurements and the top of casing elevations for the CRRP wells we would like that information.
6. If your consultant has the piezometric head levels for "artesian" wells, CRRP-1 and CRRP-3, please forward that information to the Department.
7. Sample collection, handling, and shipping procedures for all wells should be described. Your consultant, Mr. Ron Manning, may be able to provide this information.
8. The analytical laboratory cover letter signed by the laboratory director indicating the conditions of the samples, as received by the lab, may have accompanied the laboratory analytical results. If that letter is available for the two laboratory packages, please forward that also.
9. There is no indication of the groundwater sampling frequency or schedule. Could you inform the Department of the past sampling schedules and anticipated future sampling schedule? Further, DTSC is interested in participating in the next sampling effort. We would like to collect split samples from all groundwater wells with sufficient water, to be analyzed by DTSC's Environmental Chemistry Laboratory. We would only ask that your consultant collect additional sample volume such that our analyses can be conducted.
10. Given the anticipated presence of shallow perched groundwater in the vicinity of the WEI facility and the apparent inability of existing wells to act as sampling points, it may be necessary to install additional shallow groundwater monitoring wells. The groundwater monitoring network must ensure that any releases from the handling of California hazardous waste at the WEI facility are identified as early as possible.

Additionally, I have noticed that the laboratory practical quantitation limit (PQL, also known as a reporting limit) for some constituents exceeds the California Maximum Contaminant Levels. This may affect reported detections of some constituents, such as PCBs, some VOCs (e.g. vinyl chloride), and several metals. I am recommending that for future sampling events, CBMI should request that the laboratory PQL should at least meet California MCLs for all constituents.

I appreciate the opportunity to review the data that you transmitted and I look forward to working with you further to gain a better understanding of the groundwater quality beneath the WEI facility.

If you have any questions or comments please telephone me at (714) 484-5480, or e-mail me at [warano@dtsc.ca.gov](mailto:warano@dtsc.ca.gov).

Very truly yours,



Wendy W. Arano, P.G.  
Engineering Geologist  
Office of Geology

cc.: Mr. Paul MacKey,  
Mr. Paul Slama  
Mr. Hamid Saebfar  
Mr. Alfredo Zanoia, C.E.G., CH.G.